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Counsel for E. Lynn Schoenmann,
Chapter 7 Trustee

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PETER R. FADER
dba Urchin Capital Partners
dba Urchin Partners LLC,

Debtor.

Case No.: 08-30119-DM

Chapter 7

**NOTICE OF ERRATA AND
AMENDMENT TO NOTICE OF
MOTION TO APPROVE
COMPROMISE OF ADVERSARY
PROCEEDING AGAINST STEVEN R.
BOAL AND QUOTIENT
TECHNOLOGY PURSUANT TO FRBP
9019**

Hearing Date:

Date: November 15, 2022

Time: 11:30 a.m.

Place: Telephonically or by Video

Judge: Honorable Dennis Montali

Objection Deadline: November 8, 2022

PLEASE TAKE NOTICE THAT on October 19, 2022, E. Lynn Schoenmann ("Trustee") filed a *Motion to Approve Compromise of Adversary Proceeding Against Steven R. Boal and Quotient Technology Pursuant To FRBP 9019* (the "Motion") [Docket No. 100] and a *Notice of Hearing on Motion to Approve Compromise of Adversary Proceeding Against Steven R. Boal and Quotient Technology Pursuant to FRBP 9019* [Docket No. 101] (the "Notice"). The Motion and Notice summarized the terms of a Settlement Agreement and Release (the "Settlement Agreement") by and between the Trustee, Steven R. Boal and Quotient Technology Inc. However, the Motion

1 and Notice did not clearly state that defendants Steven R. Boal and Quotient Technology Inc.'s
2 (collectively "Defendants") obligations to pay the \$5,000,000 settlement amount is conditioned upon
3 the Bankruptcy Court entering a final, non-appealable order approving the terms of the Settlement
4 Agreement (the "Effective Date"). This Notice of Errata and Amendment to Notice is intended to
5 clarify that the Defendants' payment obligations under the Settlement Agreement do not arise until
6 after the Effective Date.

7 As set forth in the Settlement Agreement, a copy of which is attached to the Trustee's
8 declaration as Exhibit A [Docket No. 100-2], the Defendants are to pay the Trustee the following
9 two payments:

- 10 • First Payment: The sum of two million, five-hundred thousand U.S.
11 Dollars (\$2,500,000) to be paid within the earlier of (i) December 15,
12 2022, provided that the Effective Date precedes that date by at least five
13 (5) business days, and (ii) fifteen (15) business days of the Effective Date.
- 14 • Second Payment: The sum of two million, five-hundred thousand U.S.
15 Dollars (\$2,500,000) received by the Trustee no later than ninety (90)
16 calendar days after the first Payment was initially due.

17 In the event of any conflict between the summary of the Settlement Agreement set forth in
18 the Motion and/or Notice and the Settlement Agreement itself, the terms of the Settlement
19 Agreement shall govern.

20 **PLEASE TAKE FURTHER NOTICE** that the caption of the Notice erroneously states that
21 the Objection Deadline is October 28, 2022. The correct Objection Deadline is **November 8, 2022**
22 (and was so noted on page 3 of the Notice).

23 **PLEASE TAKE FURTHER NOTICE** that page 3 of the Notice contains the incorrect
24 address of Trustee's counsel for service of any objection or response. The correct address is:

25 PACHULSKI STANG ZIEHL & JONES LLP
26 One Sansome Street, 34th Floor, Suite 3430
27 San Francisco, CA 94104

28 Dated: October 21, 2022

PACHULSKI STANG ZIEHL & JONES LLP

By: /s/ Miriam Manning
Miriam Manning
Counsel for E. Lynn Schoenmann,
Chapter 7 Trustee